

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CAROL M. MCDONOUGH, *et al.*,

Plaintiffs,

v.

TOYS “R” US, INC., d/b/a BABIES “R” US, *et al.*,

Defendants.

No. 2:06-cv-00242-AB

ARIEL ELLIOTT, *et al.*,

Plaintiffs,

v.

TOYS “R” US, INC., d/b/a BABIES “R” US, *et al.*,

Defendants.

No. 2:09-cv-06151-AB

**MOTION OF OBJECTOR KEVIN YOUNG FOR LEAVE TO FILE REPLY TO
PLAINTIFFS’ RESPONSE TO OBJECTIONS TO
PROPOSED SETTLEMENT AGREEMENT AND ORDER**

Kevin Young, Objector to the proposed settlement of the above-captioned class action litigation, by his undersigned counsel, respectfully requests permission to file a reply to Plaintiffs’ Response to Objections to the Proposed Settlement Agreement and Order. In support of this motion, Mr. Young states as follows:

1. On June 6, 2011, Mr. Young timely filed his Objection and Notice of Intent to Appear (docket entry #749) at the settlement fairness hearing scheduled for July 6, 2011.
2. On June 13, 2011, class counsel filed Plaintiffs’ Response to Objections to the Proposed Settlement Agreement and Order (docket entry #760).
3. A reply is necessary in order to address certain errors contained in Plaintiffs’ Response relating to the purported benefits of the proposed settlement, the use of lodestar

analysis, and the cy pres portion of the proposed settlement. Mr. Young also wishes to correct minor errors contained in his original Objection.

4. Permitting Mr. Young to file a written reply to Plaintiffs' Response will help ensure that the Court has a complete record on which to decide the fairness of the proposed settlement. A written reply will also promote efficient use of time at the July 6, 2011 fairness hearing.

Wherefore, for all of the foregoing reasons, Objector Kevin Young respectfully requests leave to file a Reply to Plaintiffs' Response to Objections the Proposed Settlement Agreement and Order (docket entry #760). A proposed order is attached.

DATED: June 15, 2011

Respectfully submitted,

/s/ Christopher M. Arfaa

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